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December 6, 2012
File: E-20994, Amendment 11

Brown, Winick, Graves, Gross, Baskerville and Schoenebaum, P.L.C.
Attn.: Leanna D. Whipple
666 Grand Avenue, Suite 2000
Des Moines, IA 50309

Dear Ms. Whipple:

On October 1, 2012, in compliance with Iowa Code chapter 478, you filed with the Iowa Utilities Board, on behalf of ITC Midwest LLC (ITC), a petition for amendment of electric franchise to rebuild of 3.73 miles of existing 34.5 kV nominal voltage electric transmission line to 69 kV in Linn County, Iowa using the abbreviated franchise process. The petition has been assigned to Docket No. E-20994, Amendment 11 (AM11); please identify this filing by this docket number in all future communications.

Staff review of the petition has identified several deficiencies, which must be corrected for processing to continue.

1. Exhibit A

- a. Third paragraph (in bold print), line 2, toward the end of line, there found a misspelling of Coggon. Please revise.
- b. Last paragraph, line 5, at the beginning of line, you indicated "... east margin of public right of way ...". However, for clarity and consistency, please indicate such east public right of way of which road/county road/highway?

2. Exhibit B

- a. At the top of page, and in the middle of page, basically to the right of "R6W", there found a rectangular box. Please indicate what it is or otherwise remove it.
- b. Section 15, T86N, R6W, along the proposed line (at the end of 12.5 V-phase underbuild (ub) and the beginning of 7.2 kV single-phase ub), field inspection has

reported a single phase tap west crossing State Highway 13. By 199 IAC 11.2(3)"b"(1), please indicate it in the map.

c. Section 27, T86N, R6W, SE1/4, and at the north end of 7.2 kV ub, field inspection has indicated an existing tap west crossing State Highway 13. Similar to 2.b. above, please revise by showing it in the map.

d. Sections 34 and 35, T86N, R6W. For clarity and consistency, please show a section line in between said two sections.

e. The Legend, for clarity please add a symbol for section line.

3. Exhibit C – Segment 1 of 3 (no ub)

a. Page 1, line 13, 2nd filled-in blank (conductor size). For clarity and consistency, we suggest a removal of the capital letter T.

b. Page 1, line 18, 2nd column from right, you indicated an insulator (for an angle structure) which is even larger and longer than the one being used on a dead-ending structure. Please explain.

c. Page 3, line 44, for clarity please at least to indicate "N/A", but do not leave blank.

Note: If "N/A" was indicated on line 44, then lines 45 thru 56 could be leaving as blanks.

4. Exhibit C – Segment 2 of 3 (with IPL 7.2 kV single phase ub)

Page 1, line 13, 2nd filled-in blank. See 3.a. above and revise.

5. Exhibit C – Segment 3 of 3 (with IPL 12.5 kV ub)

a. Page 1, line 13, 2nd filled-in blank. See 3.a. above, and revise.

b. Page 3, line 46, you indicated "3" which found not complete. What about 12.5 kV V-phase ub? We suggest line 46 to be revised as "3 **and** 2", or otherwise provide a separate Exhibit C for 12.5 kV V-phase ub.

c. Page 3, line 56, 3rd filled-in blank (of 12-foot crossarm), its cross section dimension (4.5" x 3.5") found smaller than that of 8-foot crossarm (of line segment 2) which is not a common practice. Please explain, or otherwise provide wood species strength of both 8-foot and 12-foot crossarms used.

d. Please provide 12.5 kV **V-phase underbuild drawings** (tangent, angle, dead-ending, etc).

6. Exhibit F

a. List of utilities, left column, 3rd address, the zip code 52401 found not correct. See previous docket E-20994, Amendment 9, revise, resend the notification letter, and provide this office a copy of resent letter.

b. List of utilities, right column, 3rd address, you had listed the PO Box 369 which found not consistent with our reference (PO Box 389). Please review, and revise (if necessary). If what you had listed was not correct, then we suggest the notification letter be resent, and a copy of resent letter be provided to this office. Second, right column, 4th address, for consistency please revise as "2800 Livernois **Rd.**".

c. Our field inspection has also found **Windstream Communications** (telephone pedestal and underground fiber optic cable markers) in the west public right of way of State Highway 13, **Alliant Energy Corporation** (underground gas pipeline markers) in northeast, southeast and southwest quadrants of the intersection of State Highway 13 and Valley Farm Road. By 199 IAC 11.2(3)"f", please identify their ownerships in the Exhibit F's Utilities mailing list, send notification letters to such companies, and provide this office a copy of sent letters.

d. Field inspection has also found an overhead 12.5 kV line crossing underneath the proposed line by the intersection of State Highway 13 and Valley Farm Road. Please identify its ownership, and address similarly to 6.c. above.

e. By the intersection of State Highway 13 and Hutchinson Rd. (northeast corner/quadrant), field inspection has indicated a communication pedestal. Please identify its ownership, and address similarly to 6.c. above.

f. Exhibit F's notification letter was dated October 1, 2010. Please re-address, and provide this office a copy of re-addressed letter.

7. Safety and Route

No further comments or questions other than the ones mentioned above. We will notify you at a later time if there were any further questions or concerns.

If you have any questions, feel free to contact me at 515-725-7339 or at bao.nguyen@iub.iowa.gov

Sincerely,

/s/ Bao Nguyen

Bao Nguyen
Utilities Regulation Engineer
Safety and Engineering Section